

Exhibit 3

3405-4

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
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6 IN RE: JUUL LABS, INC., MARKETING,
7 SALES PRACTICES, AND PRODUCTS Case No.
LIABILITY LITIGATION 19-MD-02913-WHO

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15 VIDEO-RECORDED DEPOSITION of ERICA LINGRELL

16 (Via videoconference)

17 Thursday, August 19, 2021
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24 REPORTED BY:
25 CYNTHIA MANNING, CSR No. 7645, CLR, CCRR
JOB NO. 197527

1 reviewed the Complaint in this case.

2 Am I remembering that correctly?

3 A. Yes.

4 Q. Are you aware of what SFUSD alleges
5 that the Altria defendants did as it relates to
6 this case?

7 A. No.

8 Q. Are you aware of what the kind of
9 relief is that the -- that SFUSD is seeking
10 against the Altria defenses in this case?

11 A. No.

12 Q. A lot of the questions today have
13 related to educational and programmatic efforts
14 that you've had and that you've been a part of.

15 Is it fair to say that generally your
16 efforts have been around activities, like, for
17 example, tobacco prevention, alcohol prevention,
18 things like that, as opposed to company
19 specific?

20 A. I'm not sure I understand the question.

21 Q. Sure.

22 I realized halfway through that
23 question that it didn't quite come out properly.

24 So a lot of the educational efforts
25 that you've discussed today relate to topics;

1 think that?

2 A. No.

3 Q. You mentioned advertising. Are you
4 aware of any advertising that Altria may have
5 done for JUUL products?

6 A. No.

7 Q. Okay. So fair to say, then, you're not
8 aware of any students -- you're not personally
9 aware of any students who have seen or received
10 Altria advertising for JUUL products; is that
11 correct?

12 A. Yeah. I mean, like I said, you know, I
13 don't know if anyone on my staff is more
14 thinking about that or some of the health
15 teachers called that out with their students.

16 For me personally, I don't have an
17 example that I can think of.

18 Q. Okay. And is there anyone on your
19 staff, in particular, you think would be most
20 knowledgeable, like someone who have this
21 knowledge about Altria-specific information?

22 A. I would say, you know -- he is not on
23 my staff, but we have contracted him to do -- to
24 do trainings, Ira Sachnoff, S-A-C-H-N-O-F-F.
25 You know, he would -- he would know if he has

1 talked about it with staff at trainings.

2 Q. And so Ira would be -- just so I am
3 clear, he would not be an SFUSD employee? Is
4 that a contractor or speaker who would come in?

5 A. Yeah. It's tricky because he used to
6 be an SFUSD employee, and I can't remember what
7 year he -- he is now a consultant. So yeah.

8 Q. Do you know, is he a consultant
9 specifically for SFUSD or does he do other
10 clients and SFUSD as one of his client?

11 A. SFUSD is one of his clients, yeah.

12 Q. Okay. Are you aware of any services
13 that Altria would have provided to a retailer
14 who sells JUUL products?

15 A. No.

16 Q. Okay. And just one last question. You
17 also discussed a lot about grants and grant
18 writing today.

19 Similar question to before. If you
20 wrote a grant -- or if you wrote a grant or were
21 seeking a grant, it would be by topic for like
22 an ENDS or an e-cigarette campaign; is that
23 right?

24 A. If I wrote a grant it would be for --

25 Q. Sorry.